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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE DIVISION)

YUVAL LAPINER, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

CAMTEK, LTD., RAFI AMIT and RONIT
DULBERG,

Defendants.

No. 08-cv-01327-MMC

NOTICE OF NON-OPPOSITION TO
MOTION OF YUVAL LAPINER FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD
PLAINTIFF'S SELECTION OF CO-
LEAD COUNSEL

Date: June 13, 2008
Time: 9:00 a.m.
Courtroom 7

Proposed lead plaintiff, Yuval Lapiner ("Lapiner" or "Plaintiff"), respectfully submits this Notice of Non-Opposition to his motion for appointment as lead plaintiff and approval of Glancy Binkow & Goldberg LLP and The Law Office of Jacob Sabo as co-lead counsel.

For the reasons stated herein, Lapiner respectfully requests that the Court vacate the June 13, 2008 hearing, and decide the motion for appointment of lead plaintiff and approval of lead counsel on submission.

I. Background

This is a securities class action on behalf of investors who purchased the common stock of Camtek, Ltd. ("Camtek" or the "Company") during the period November 22, 2005 through December 20, 2006 (the "Class Period").

1 Camtek engages in the design, development, manufacture and marketing of automated
 2 optical inspection systems which inspect various types of electronic product components for
 3 manufacturing defects.

4 Plaintiff alleges Camtek and certain of its executive officers participated in a fraudulent
 5 scheme and deceptive course of business in violation of the Securities Exchange Act of 1934
 6 (the "Exchange Act"). Specifically, Plaintiff alleges that during the Class Period defendants
 7 made material misrepresentations and omissions concerning the business, prospects and financial
 8 performance of Camtek, which caused the price of the Company's stock to become artificially
 9 inflated, inflicting damages on investors.

10 On March 7, 2008, Yuval Lapiner filed the instant action, and on May 9, 2008, Lapiner
 11 moved this Court for appointment as lead plaintiff and for approval of his selection of co-lead
 12 counsel pursuant to §21D(a)(3)(B) of the Exchange Act, as amended by the Private Securities
 13 Litigation Reform Act of 1995("PSLRA"), 15 U.S.C. §78u-4(a)(3)(B). Lapiner's motion for
 14 appointment as lead plaintiff is pending.

16 **II. Yuval Lapiner Has Satisfied The Requirements Of The PSLRA**

17 The PSLRA sets forth the procedure for appointment of lead plaintiff in class actions
 18 brought under federal securities laws. *See generally* 15 U.S.C. §78u-4. First, notice of the class
 19 action must be published "in a widely circulated national business-oriented publication or wire
 20 service" within 20 days following the filing of the class action complaint. 15 U.S.C. §78u-
 21 4(a)(3)(A)(i). Second, any member of the purported class who wishes to seek appointment as
 22 lead plaintiff must file a motion with the court "*not later than 60 days* after the date on which
 23 the notice [was] published." 15 U.S.C. §78u-4(a)(3)(A)(i). (Emphasis added.)

24 Here, notice of the action, *Yuval Lapiner v. Camtek, Ltd., et al.*, No. 08-cv-01327-MMC,
 25 was published by Plaintiff's counsel on *Prime Newswire*, a nationally circulated business-
 26 oriented wire service, on March 10, 2008 – within the PSLRA-mandated twenty-day deadline
 27 following the filing of the action. *See* Docket No. 5, Declaration of Lionel Z. Glancy in Support
 28

1 of Motion of Yuval Lapiner for Appointment as Lead Plaintiff and Approval of Lead Plaintiff's
2 Selection of Co-Lead Counsel ("Glancy Decl."), Exhibit A. Consequently, the first procedural
3 requirement – notice – has been satisfied. Additionally, Lapiner's motion is procedurally proper
4 because it was filed May 9, 2008 – within the 60-day deadline established by the PSLRA to seek
5 appointment as lead plaintiff. *See Osher v. Guess?, Inc.*, No. CV 01-00871 LGB (RNBx), 2001
6 WL 861694, at *3 (C.D. Cal. April 26, 2001).

7 The **only** lead plaintiff motion pending before the Court is Yuval Lapiner's motion, and
8 the 60-day period in which to move for appointment as lead plaintiff has expired. Thus, no
9 further applications can be filed or considered by the Court, and Lapiner's unopposed motion
10 should be granted pursuant to the PSLRA. *See* 15 U.S.C. §78u-4(a)(3)(B).

11 The PSLRA provides that the court **shall adopt** a rebuttable presumption that "the most
12 adequate plaintiff in any private action arising under this chapter is the person or group of
13 persons that...has the largest financial interest in the relief sought by the class" and "otherwise
14 satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure." 15 U.S.C. §78u-
15 4(a)(3)(B)(iii)(I)(emphasis added); *see also In re Sprint Corp. Sec. Litig.*, 164 F. Supp. 2d 1240,
16 1244 (D. Kan. 2001)(holding an unopposed proposed lead plaintiff, having met the statutory
17 elements and with no evidence before the court rebutting the presumption, to be the most
18 adequate plaintiff).

19 As the only proposed lead plaintiff presently before the Court, it is axiomatic that Yuval
20 Lapiner has the largest financial interest in the relief sought by the class. *See Sprint*, 164 F.
21 Supp.2d at 1243; 15 U.S.C. §18u-4(a)(3)(B)(iii)(I). Further, the Ninth Circuit has reasoned, "[i]f
22 the plaintiff with the largest financial stake in the controversy provides information that satisfies
23 [the requirements of Rule 23], [it] becomes the presumptively most adequate plaintiff." *See In re*
24 *Cavanaugh*, 306 F.3d 726, 730 (9th Cir. 2002). As demonstrated by his May 9, 2008 motion,
25 Lapiner unquestionably satisfies the requirements of Rule 23. *See* Docket No. 4, Memorandum
26 of Points and Authorities in Support of Motion of Yuval Lapiner for Appointment as Lead
27
28

1 Plaintiff and Approval of Co-Lead Counsel, at 6-8. Moreover, Lapiner has retained counsel with
 2 extensive experience prosecuting securities class action litigation. *Id.*, at 9; Glancy Decl., Exhs.
 3 D-E. Yuval Lapiner is, therefore, the presumptive “most adequate plaintiff” under the PSLRA
 4 because he satisfies all the requirements for appointment as lead plaintiff. *See* 15 U.S.C. §78u-
 5 4(a)(3)(B)(iii)(I); *see also Greebel v. FTP Software*, 939 F. Supp. 57,64 (D. Mass. 1996), *aff’d*,
 6 194 F.3d 185 (1st Cir. 1999); *Squyres v. Union Tex Petroleum Holdings, Inc.*, CV 98-6085-LGB-
 7 AIJx, 1998 WL 1144586, at *2-*3 (C.D. Cal. Nov. 2, 1998).

8 **III. Conclusion**

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 10 Based on the foregoing, Yuval Lapiner is presumptively “the most adequate plaintiff” to
 11 serve as lead plaintiff in the instant action. Because notice of the filing deadline was timely
 12 published, all persons and entities were given an opportunity to be heard or to move for
 13 appointment as lead plaintiff in opposition to Lapiner’s May 9, 2008 motion. *See* 15 U.S.C.
 14 §78u-4(a)(3)(A)(i). No other person or entity timely moved for appointment as lead plaintiff, no
 15 opposition to Lapiner’s motion has been filed, and no evidence has been presented to rebut the
 16 presumption that Lapiner is the most adequate plaintiff. Consequently, Yuval Lapiner
 17 respectfully requests that the Court: (a) appoint him as lead plaintiff, and (b) approve his
 18 selection of Glancy Binkow & Goldberg LLP and The Law Office of Jacob Sabo as co-lead
 19 counsel for the class. 15 U.S.C. §78u-4(a)(3)(B)(v).

20 Because his motion is the only lead plaintiff motion pending before the Court, Yuval
 21 Lapiner respectfully requests that the Court vacate the June 13, 2008 hearing and decide the
 22 motion for appointment of lead plaintiff and approval of lead counsel on submission.

23
 24 DATED: June 6, 2008

Respectfully submitted,

GLANCY BINKOW & GOLDBERG LLP

By: s/ **Peter A. Binkow**

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PROOF OF SERVICE BY ELECTRONIC POSTING PURSUANT TO NORTHERN DISTRICT OF CALIFORNIA LOCAL RULES AND ECF GENERAL ORDER NO. 45 AND BY MAIL ON ALL KNOWN NON-REGISTERED PARTIES

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is One Embarcadero Center, Suite 760, San Francisco, California 94111.

On June 6, 2008 I served the following by posting such documents electronically to the ECF website of the United States District Court for the Northern District of California:

1. NOTICE OF NON-OPPOSITION TO MOTION OF YUVAL LAPINER FOR APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF CO-LEAD COUNSEL.

2. CASE MANAGEMENT STATEMENT

on all ECF-registered parties in the action and, upon all others not so-registered but instead listed below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Los Angeles, California. They are:

SEE SERVICE LIST

Executed on June 6, 2008, at Los Angeles, California.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Zabella O. Moore

Zabella O. Moore

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SERVICE LIST

Electronically to all ECF-Registered Entities

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